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16158.0023

RECEIVED

December 20, 2000

DEC 20 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., SW
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

NOTICE OF EX PARTE
PRESENTATION

Re: CC Docket No. 96-128/remand of inmate service issues)

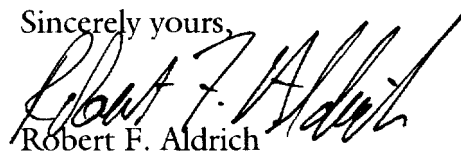
Dear Ms. Salas:

On December 19, 2000, Robert Aldrich of this law firm and Vince Townsend of Pay-Tel Communications, Inc., representing the Inmate Calling Service Providers Coalition, met with Jay Atkinson and Adam Candeub of the Competitive Pricing Division

We discussed the proceeding regarding inmate calling services on remand from the United States Court of Appeals for the D.C. Circuit.

The substantive points discussed are reflected in the enclosed documents which were handed out at the meeting.

Sincerely yours,



Robert F. Aldrich

RFA:nw

cc: Jay Atkinson
Adam Candeub

11/20/00 at 1

1177 Avenue of the Americas • New York, New York 10036
Tel (212) 835-1400 • Fax (212) 997-9880
<http://www.dsma.com>

DEC 20 2000

CC DOCKET NO. 96-128

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

INMATE CALLING SERVICE PROVIDERS COALITION

RESPONSE TO THE RBOCS' NOVEMBER 27, 2000 EX PARTE LETTER

The Inmate Calling Service Providers Coalition ("ICSPC") submits the following in response to the RBOC Payphone Coalition's ex parte letter dated November 27, 2000. See Letter to Magalie Roman Salas, Secretary, FCC, from Michael K. Kellogg, November 27, 2000 ("RBOC 11/27/00 Ex Parte").

Background

Pursuant to Section 276(b)(1)(C), the Commission relies on *Computer III*¹-derived safeguards to prevent the subsidies and discrimination prohibited by Section 276(a). These safeguards are designed to prevent ILEC subsidies and discrimination in favor of services that are defined as "nonregulated." The safeguards have no effect on subsidies and discrimination in favor of services that are defined as "regulated." Therefore, in order to be effective in preventing subsidies and discrimination in favor of "inmate telephone service," that service must be defined as "nonregulated." ICSPC has contended that the FCC misclassified inmate collect calling services as "regulated," thereby depriving its safeguards of any effect in preventing subsidies and discrimination in favor of "inmate telephone service." In its ex parte submission of June 7, 2000, "Inmate Payphones: Clearing Up Misconceptions" ("RBOC 6/7/00 Ex Parte"), the RBOC Coalition contended that collect calling services are appropriately classified as regulated because they are indistinguishable from operator services accessed from public payphones.

Discussion

The RBOCs shamelessly repeat their misleading claim, previously made in their June 7 Ex Parte and specifically rebutted by ICSPC in its September 12, 2000 rebuttal,² that the ICSPC's position should be rejected because "the FCC has already held [that] where ILECs provide collect calling to their inmate payphones, that service does constitute operator services within the meaning of the 1996 Act for purposes of implementation of section 276." RBOC 11/27/00 Ex Parte at 2. As ICSPC explained, the FCC's prior rulings on this issue are the very rulings that the

¹ *Amendment of Section 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry)*, 104 FCC 2d 958 (1986) ("Computer III Phase I Order"). (For complete citation see *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Report and Order*, 11 FCC Rcd 20541, 20637, n. 634 (1996) ("First Payphone Order").)

² "Response to the RBOC/GTE Payphone Coalition Ex Parte 'Inmate Payphones: Clearing Up Misconceptions,'" filed by the Inmate Calling Service Providers Coalition, September 12, 2000 ("ICSPC 9/12/00 Ex Parte").

Commission is reconsidering in this remand proceeding. If the RBOCs' argument were accepted as coherent, then the Commission could avoid granting any request for reconsideration, merely by citing the rulings under reconsideration as "precedent."

The RBOCs *do not* repeat their other previous claim that inmate collect calling services "fall within the Act's definition of operator services." RBOC 6/7/00 Ex Parte at 2, *quoting Local Exchange Carriers permanent Cost Allocation Manual for the Separation of Regulated and Nonregulated Costs, Memorandum Opinion and Order*, 14 FCC Rcd 16784, 16791, ¶11 & n. 38 (1999). As ICSPC's September 12 response pointed out, that statement was simply untrue: Inmate collect calling does *not* fall within the statutory definition of operator services. Instead, the RBOCs shift ground, contending that the statutory definition is irrelevant. If so, then it is unclear why the RBOCs made their incorrect statutory claim in the first place.

In fact, the statutory definition of "operator service" *is* relevant, although not dispositive, because the RBOCs' newest argument is that treating inmate collect calling service differently from public payphone-accessible operator services would be "contrary to the statutory language." RBOC 11/27/00 Ex Parte at 3. The RBOCs' syllogism runs: (1) Inmate collect calling services are operator services; (2) Operator services are not included in payphone services; therefore, (3) Inmate collect calling services are not included in "payphone services." When it is recognized that the statute does *not* classify inmate collect calling services as operator services, the RBOCs' argument breaks down at the very start.

The rest of the RBOCs' statutory argument is equally unsound. As ICSPC has previously explained, in referring to the class of services for which the FCC must promote competition and end subsidies and discrimination, Section 276 uses the term "payphone service," and defines that term to include "inmate telephone service." Collect calling service represents 100% of the inmate calls made from most confinement facilities.³ Therefore, by simple logic, if "inmate telephone service" means anything, it means collect calling service. ICSPC 9/12/00 Ex Parte at 4. The RBOCs try to avoid logic by claiming that the terms "payphone service" and "inmate telephone service" are not to be taken literally. According to the RBOCs, these terms do not refer to *any services*, but are only intended to encompass the provision of telephone *equipment*. RBOC 11/27/00 Ex Parte at 3. This effort to explain away Congress's use of the term "service" is wholly unconvincing. It is particularly unconvincing because Congress specifically required, at a minimum, and the FCC chose to utilize, "*Computer III*" safeguards, which include the "CEI plans" referenced in the same RBOC Ex Parte (*id.*), to prevent subsidies and discrimination in favor of the RBOCs' "payphone service" and "inmate telephone service." CEI, or Comparably Efficient Interconnection, was adopted to ensure that independent enhanced *service* providers had nondiscriminatory access to the same network service features and functions that the RBOCs used to provide their

³ As previously submitted by ICSPC, collect calling represents 100% of call volume at most inmate facilities. Local and intraLATA collect calls represent some 90% of average call volume at jail facilities.

enhanced service. See *First Payphone Order*, 11 FCC Rcd at 20636-44, and decisions cited therein. Mere equipment providers would not be entitled to CEI – enhanced service providers and payphone service providers are entitled to CEI because they use their equipment, in combination with services provided by the ILEC, to provide service to end users in competition with ILECs.⁴

Further, the RBOCs are “flatly wrong” (RBOC 11/27/00 Ex Parte at 2) in their contention that *public* “payphone service” under Section 276 consists only of the provision of equipment, and not *any* genuine service (*id.* at 3).⁵ As ICSPC has pointed out several times previously, the Commission has ruled that ILECs’ local coin service is included in the nonregulated “payphone service” that ILECs may not subsidize or discriminate in favor of under Section 276. See, e.g., ICSPC 9/12/00 Ex Parte at 4, n. 5. See also *Local Exchange Carriers Permanent Cost Allocation Manual for the Separation of Regulated and Nonregulated Costs*, Memorandum Opinion and Order, 14 FCC Rcd 16784 (1999). Application of Section 276 to *public* payphone service would mean little or nothing if the primary service offered at *public* payphones continued to be provided by the RBOCs’ regulated side, with no limits on subsidies and discrimination in favor of that service. Similarly, collect calling service is the primary – and in most cases the *only* – telephone service offered to inmates of correctional facilities. By the same token, application of Section 276 to *inmate* telephone service means little or nothing as long as the RBOCs’ primary

⁴ As an example of how CEI is geared to *services*, one of the “equal access parameters” of CEI is “resale.” *First Payphone Order*, 11 FCC Rcd at 20642, citing *Computer III Phase I Order*, 104 FCC 2d at 1039-43. Fundamental to the Computer III CEI scheme, of course, is the concept that both independent service providers and the RBOC’s “nonregulated” accounting entity are *reselling* the RBOC’s basic services. The RBOC’s basic services must be sold to independent providers on the same basis as they are sold to the RBOC’s nonregulated accounting entity. However, if the RBOC accounting entity is not reselling *any* services, then there is no reason for the accounting entity to buy any services, and CEI’s “resale” parameter is meaningless.

⁵ The RBOCs also state that Section 276 could not have been intended to remove subsidies and discrimination in favor of any *services* because “section 276 obviously does not require LECs to deregulate the portion of their networks that are devoted to providing service to public payphones.” *Id.* Here again, the RBOCs avoid the fundamental point of the *Computer III* “resale” structure embedded in the CEI safeguard. It is not necessary for ILECs to “deregulate” any portion of their network facilities, or of the network services provided to *their payphones*. Rather, it is necessary for the RBOCs to “deregulate” (i.e., place on the “nonregulated” side of the *Computer III* ledger) the inmate telephone service that they provide to *inmates and end users*. *Computer III* clearly distinguishes between service provided by the ILEC to its nonregulated entity, which remains “regulated” (but which must be offered to independent service providers on an equivalent basis) and service provided by the ILEC’s nonregulated entity to end users, which is classified as deregulated and may not benefit from subsidies or discrimination involving regulated services.

service offering – local and intraLATA collect calling service – at *inmate* payphones remains subject to unlimited subsidies and discrimination.⁶

The RBOCs also repeat their mantra that all of this argument is academic because ICSPC's "accusations of discrimination and subsidization are unsubstantiated" and that "all services that LECs provide to their own inmate payphone operations are available to independent providers." Ex Parte at 1. Specifically, the RBOCs claim that:

LEC operator services are available to independents on the same terms and conditions as to its affiliated inmate operation. They cannot confer an advantage on their affiliated inmate provider without making the same advantage available to independent providers.

RBOC 6/7/00 Ex Parte at 4.

Contrary to the RBOCs' claims, ICSPC has provided a full record of facts showing that the RBOCs practice blatant discrimination between their own collect calling services and independent inmate service providers, and confer subsidies on the RBOCs' inmate collect calling services. These do not count as facts *only* if one accepts the RBOCs' position that Section 276 only prohibits subsidy and discrimination in favor of "equipment," and leaves the RBOCs free to subsidize and discriminate in favor of their own inmate *service*.

Even on their own terms, however, the RBOCs are wrong when they state that operator services are available on a nondiscriminatory basis to independent inmate service providers. Exhibit A is an exchange of correspondence recently concluded between Pay-Tel Communications, an independent inmate services provider, and Bell Atlantic South (or Verizon). This exhibit shows that, contrary to the RBOCs' representation, the inmate collect calling functions that the RBOCs define as regulated "operator services" are *not* made available on a nondiscriminatory basis to independent inmate service providers.

The RBOCs' CEI Plans do not explain on what basis they offer operator services to their own inmateservice provider entities and to independent service providers. Therefore, it is not clear what the RBOCs mean when they say that operator services are available to both service providers on the same terms and

⁶ At a minimum, inmate telephone service must include collect calling service that is provided using dedicated call processing facilities that are separate from the RBOCs' network call processing facilities used to provide operator services accessed from public payphones. These facilities are easily segregable from network operator services facilities and are frequently "located on site." RBOC Ex Parte at 3. This is the type of configuration used in over 80% of Bell Atlantic's prison accounts, as shown in Chart 3, "Inmate Collect Calling with Store and Forward," which is attached to the RBOC's June 7 Ex Parte. For convenience of reference, we have attached the RBOC charts to this Ex Parte as well (without necessarily conceding the accuracy of the statements made on the Charts).

conditions. One way might be for independent inmate service providers to provide dedicated store-and-forward equipment in conjunction with their inmate telephones (as they do today) and to send the RBOCs' regulated operator service operation call detail for local and intraLATA collect calls originating from their inmate telephones, and have those calls billed as regulated RBOC collect calls, pursuant to the same terms and conditions that apply when the RBOC's own nonregulated operation provides inmate telephones. Under this arrangement, the independent inmate service provider would provide the "3rd Party Vendor's Inmate Call Processing Equipment" shown in Chart 3. We refer to this approach as a Dedicated Equipment Billing Option.

A second possible way for the RBOCs to arguably make their collect calling services available to independent inmate service providers would be to offer independent inmate service providers a commission on local and intraLATA calls routed to the RBOC's operator service platform, which would be equal to the commission provided to the RBOC's own nonregulated inmate telephone operation. Under this arrangement, the independent inmate service provider would provide inmate telephones, but would not necessarily provide the "3rd Party Vendor's Inmate Call Processing Equipment." We refer to this approach as an Operator Service Commission Plan.

As shown in Exhibit A, on August 22, 2000, Pay-Tel Communications requested that Bell Atlantic provide terms and conditions for whatever nondiscriminatory arrangements are available, whether through a Dedicated Equipment Billing Option or an Operator Service Commission Plan. See Tab 1. Bell Atlantic's initial response was simply to provide a list of the tariffed services currently available to independent payphone providers and inmate service providers. Tab 2. Since these services did not address Pay-Tel's query, Pay-Tel repeated its query. Tabs 3-6. Finally, Bell Atlantic responded on September 22 that it did "not have any type of discount/commission plan to offer you at this time." Tab 7. This response addressed Pay-Tel's request regarding an Operator Service Commission Plan, but not its request regarding a Dedicated Equipment Billing Option. Pay-Tel repeated the latter request. Tab 8-11. Finally, Bell Atlantic responded that it "did not provide a billing option package for inmate services." Tab 12.

In summary, this exchange of correspondence demonstrates that Bell Atlantic does not even live up to its representation that it provides its collect calling services, which it defines as "regulated" for purposes of Section 276, on a nondiscriminatory basis to independent inmate service providers on the same terms and conditions as to its own nonregulated operations.

Exhibit B

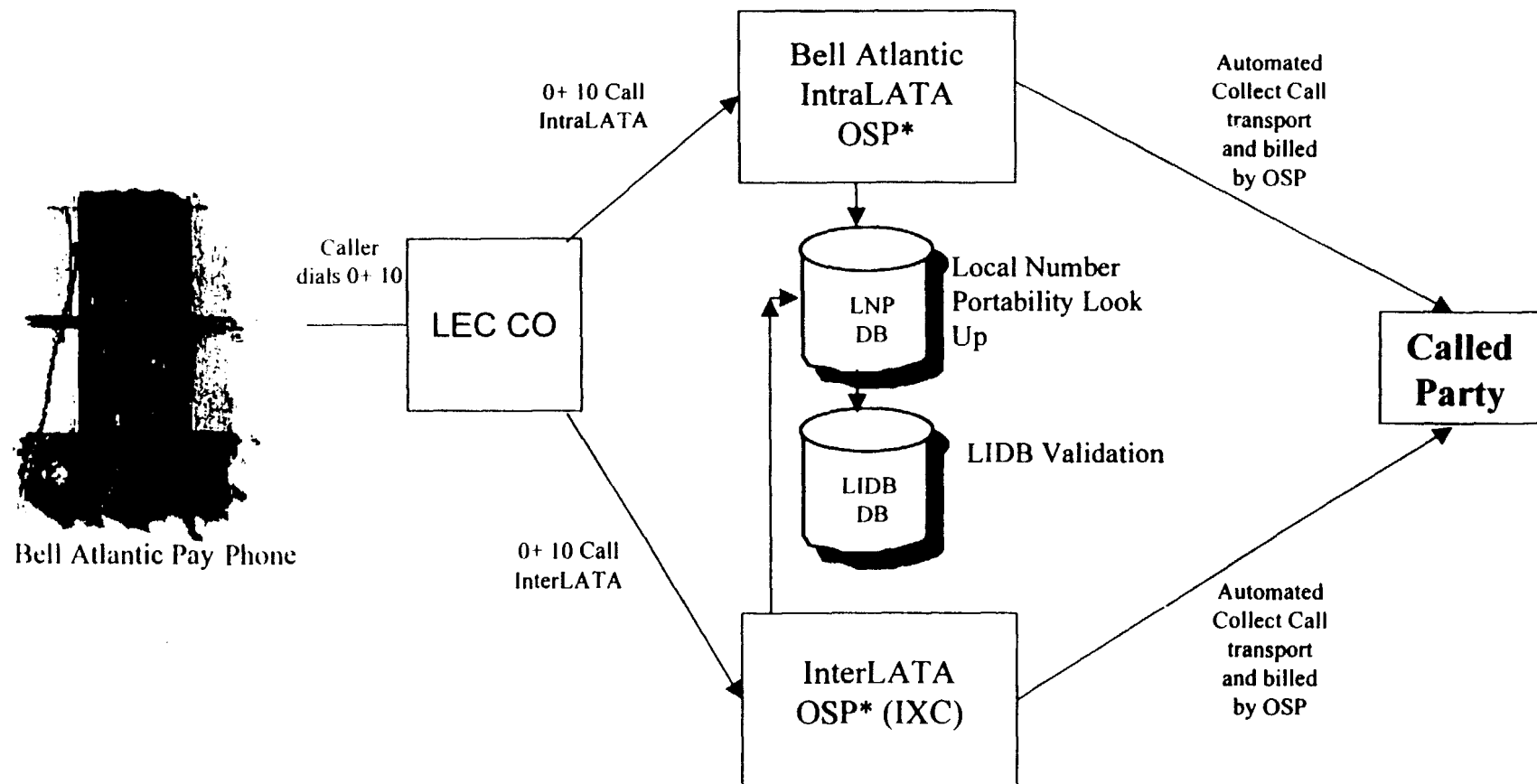
Exhibit B shows one additional way in which ILECs discriminate in favor of their own inmate telephone service. Exhibit B is a telephone bill of a law firm that received numerous local collect calls from inmate(s) of a confinement facility where U S West (now Qwest) provides the collect calling service. Page 7 of the bill states that:

You are responsible for the payment of all charges on your bill. Failure to pay these charges may result in collection action as well as termination of the unpaid service. Your basic telephone service will not be disconnected for non-payment of charges for: (1) the U S WEST services identified by an * above; (2) services of other U S WEST companies, or (3) services of other companies included on your bill.

The inmate collect calling service provided by U S West is billed on page 2 of the bill. As shown, there is no "*" identifying the calls; therefore, U S West will disconnect basic telephone service for non-payment of these charges. If the local collect calling service is provided by a different company, however, pursuant to clause (3) above, U S West will *not* disconnect basic telephone service for non-payment of the charges. This represents clear discrimination in favor of U S West's inmate telephone service, properly defined, in violation of Section 276. By refusing to follow the same service cut-off practices on behalf of independent inmate service providers as for its own inmate services, U S West imposes yet another unlawful burden on independent inmate service providers ability to collect charges for the service provided, contributes to upward pressure on inmate telephone service rates, and imposes yet another roadblock on the successful development of competition for the provision of inmate telephone service.

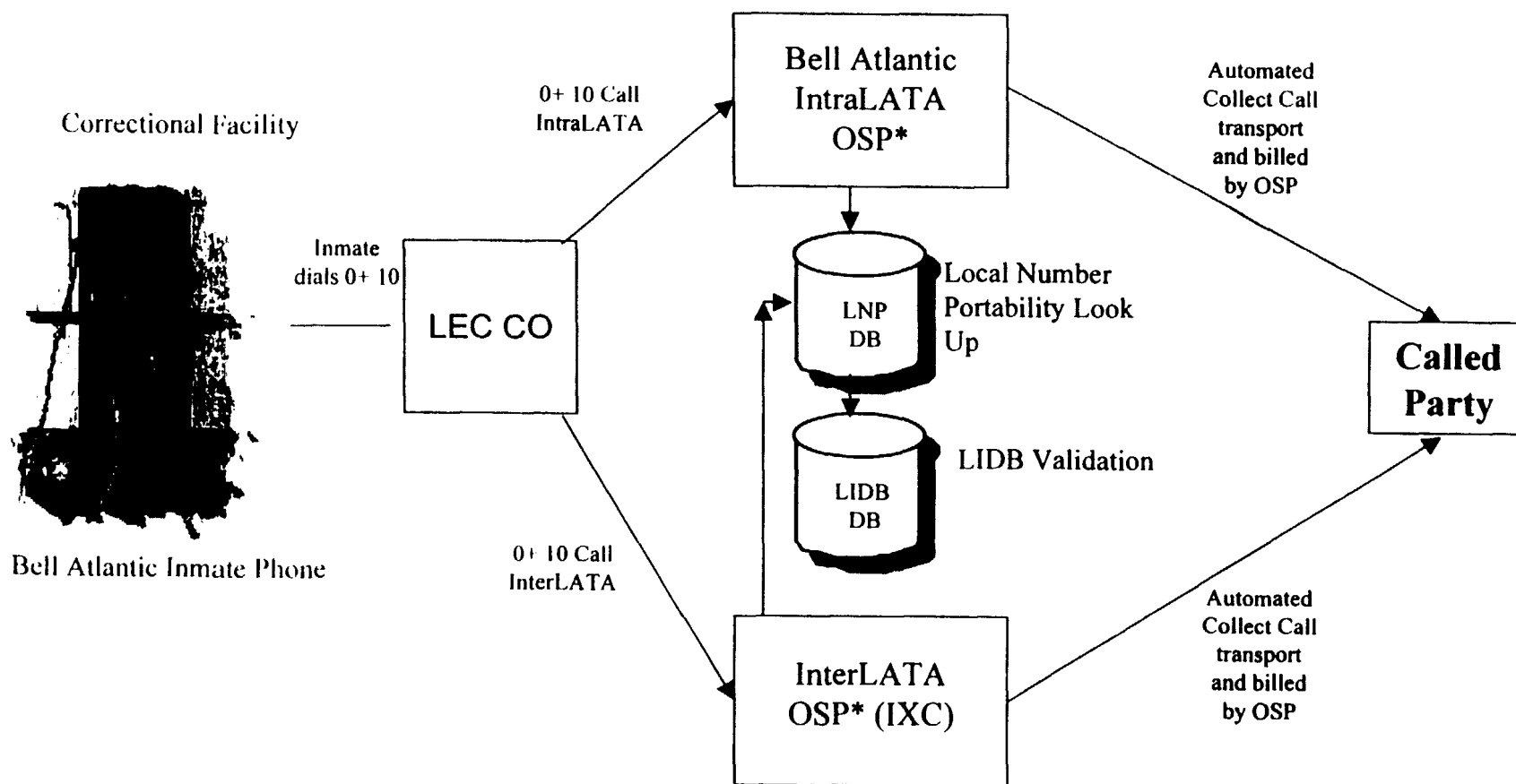
In summary, the RBOCs have provided no plausible justification for the Commission's failure to classify their inmate collect calling services as "inmate telephone service" for which subsidies and discrimination are prohibited by Section 276. Further, even if one accepts the RBOCs truncated concept of a service that consists only of the provision of equipment, the RBOCs do not even live up to their claim of nondiscrimination among inmate equipment providers.

Collect Calling from Pay Phones



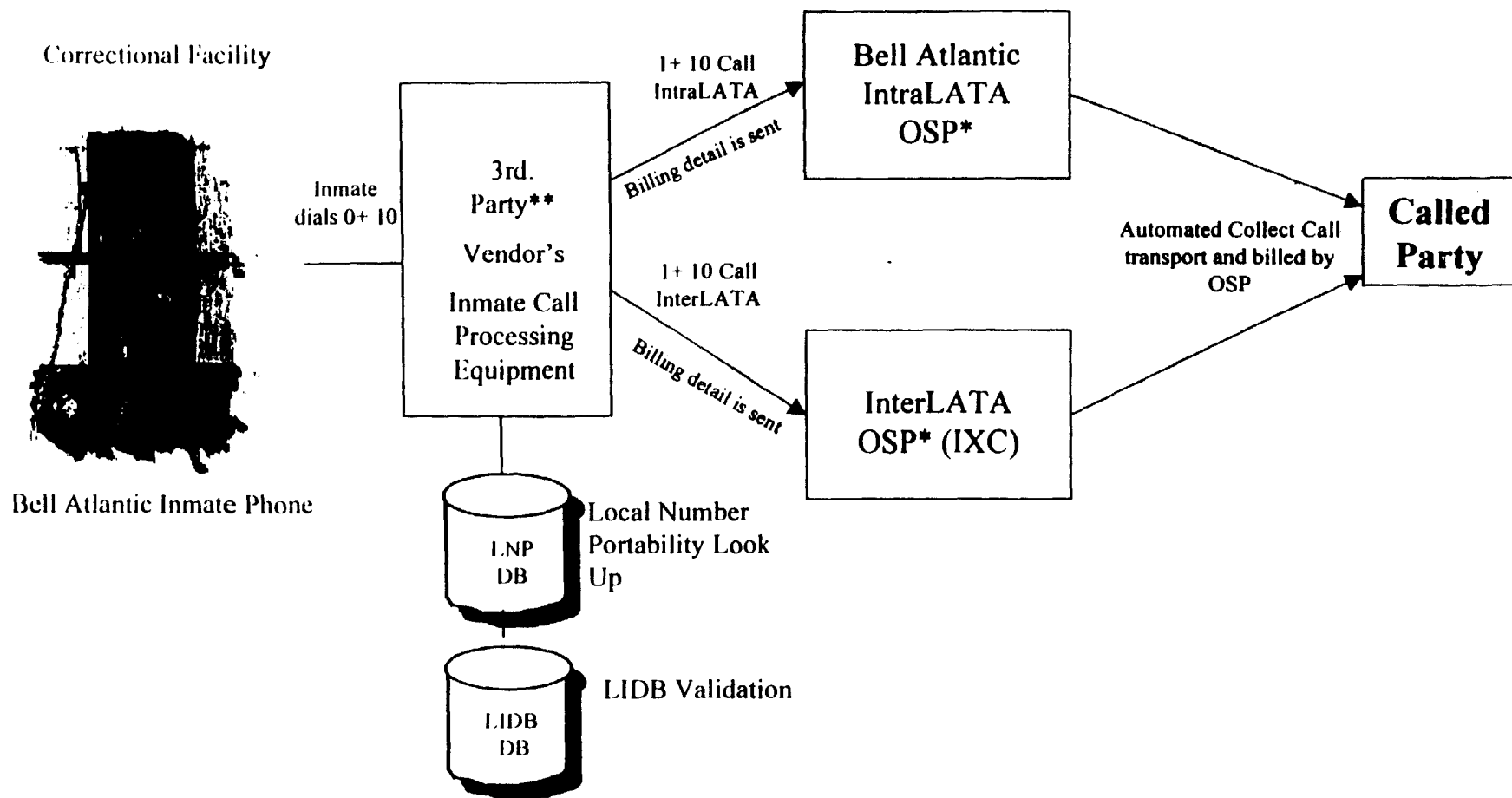
*Pays PCC/Commission for collect calls originating from payphones in same manner as other alternatively billed calls (collect + third number)

Inmate Collect Calling w/o Store and Forward



*Pays PCC/Commission to Inmate Telephone Providers

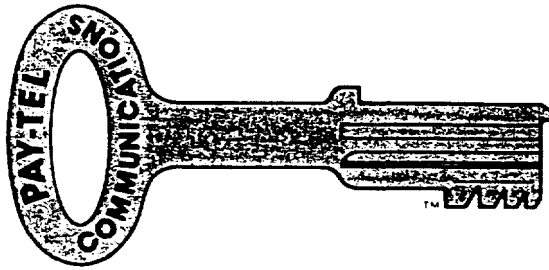
Inmate Collect Calling with Store and Forward



*Pays PCC/Commission to Inmate Telephone Providers for calls made from their inmate phones

**Inmate Call Processing equipment owned by 3rd party vendor is utilized in over 80% of prison accounts. In the remaining accounts, no call processing equipment is used (see chart 2)

EXHIBIT A



August 22, 2000

Ms. Henrietta Singleton
Regional IPP Office Manager
Bell Atlantic South
1717 Arch Street fir 23 SW
Philadelphia, PA 19103

FAX TRANSMISSION:
215-569-1854

Dear Henrietta:

We would like to determine our options on handling inmate collect calls from our facilities in Virginia. First option, we would like to request terms for Bell Atlantic Operator Services to process and bill local and intra-LATA collect calls placed by inmates of confinement facilities (e.g., city and county jails). Second option, if the first option is not available we would like to know the commission structure for inmate collect calls that are routed directly to your OS platform.

First Option:

It is our understanding today that, when Bell Atlantic Public Phone Division ("BAPPD") provides nonregulated inmate telephone service to confinement facilities served by dedicated call processing equipment (using store forward technology), call detail for local and intra-LATA calls is captured by the dedicated equipment and is sent to Bell Atlantic Operator Services ("BAOS") for billing and collection as a BAOS-provided collect call, billed at BAOS tariffed rates.

We would like to receive information about BAOS offering a comparable service plan to Pay-Tel. Pay-Tel provides inmate telephone service to confinement facilities in Bell Atlantic territory, and also provides dedicated store-and-forward call processing equipment that is used in conjunction with Pay-Tel's inmate telephone service. Pay-Tel would like to consider the option to send BAOS the call detail for local and intraLATA collect calls originating from its inmate telephones, and have those calls treated for billing purposes as BAOS calls, billed at BAOS tariffed rates, under the same terms and comparable payments that BAOS makes to BAPPD.

Please verify whether BAOS will offer us such a service plan, and provide the terms of such an offering so that we may evaluate whether to enter into such an arrangement.

In particular, we would like to know the following:

- ◆ Will BAOS offer a percentage of billed revenue for inmate phone service calls? What percentage will BAOS offer?

- ◆ Alternatively, if BAOS pays for the above on some other basis, what price will BAOS offer for the origination and processing of inmate service calls?
- ◆ How will BAOS address unbillable calls and uncollectable call revenue?
- ◆ Will BAOS pay Pay-Tel for local and intraLATA calls that terminate with other service providers, such as competitive local exchange carriers ("CLECs")?
- ◆ Will BAOS be responsible for the equipment vendor transaction fees?
- ◆ Will BAOS be responsible for local or intraLATA transmission charges?
- ◆ Will BAOS be responsible for call validation fees?
- ◆ Will BAOS be responsible for all billing and collection expenses?
- ◆ Will BAOS handle all customer service inquiries and associated costs?

Second Option:

If a service plan such as outlined above is not available, please let us know. In the alternative, please provide us with the terms that BAOS is willing to offer for the provision of operator services in connection with collect inmate service calls originated by Pay-Tel. For example, what commission structure for inmate collect calls that are routed directly to your operator services platform as 0+ 7 or 0+ 10 calls?

Your timely response to this request will be greatly appreciated.

Thank you.

Sincerely,



Vincent Townsend
President

/jp

August 24, 2000

Mr. Vincent Townsend
PayTel Communication
P.O. Box 8179
Greensboro, N.C. 27419

RE: Inmate Payphone Service

Dear Vincent,

This letter and Vendor package is a response to your letter, dated August 22, 2000 concerning inmate services. The package will provide the information needed and address your highlighted questions. Verizon Communications currently provides three new **network** controlled services for the inmate market. Please see page 2 of section 5, for service descriptions and page 10 of section 7 for non-recurring and monthly charges. Verizon doesnot offer a discount plan for inmate service

Sincerely,

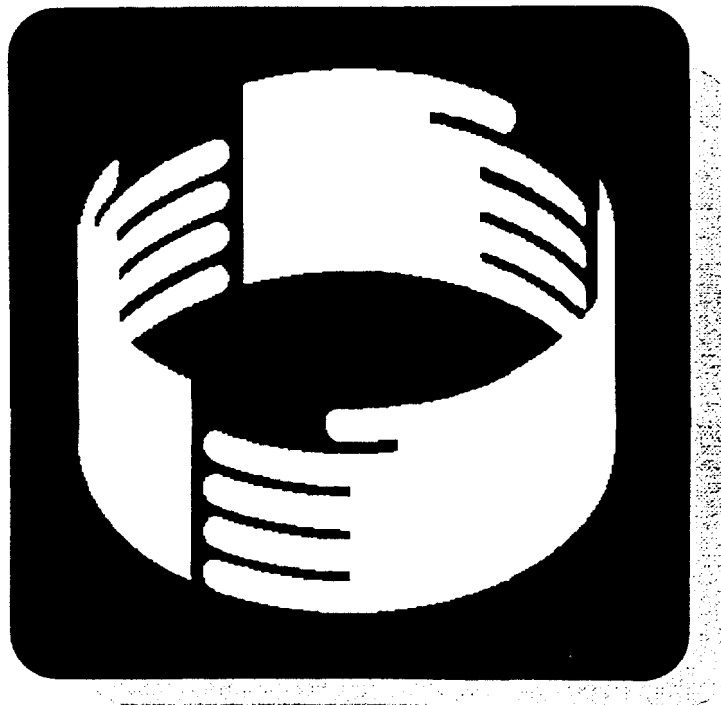
A handwritten signature in cursive script, appearing to read "Henrietta Singleton".

Henrietta Singleton
Manager: Verizon IPPSC/Mid-Atlantic Region



Independent Payphone Provider Information Package

Customer Service is Our Top Priority



*Revised February, 1999
Training Edition*

Inmate Service

Bell Atlantic now offers three new *network* controlled services for the Inmate market:

- One-Way Coinless Line - collect calls only to points within the North American Dialing Plan. The caller is limited to making O+ calls only.
- Two-Way Coinless Line - designed for use with an interface system to provide additional on-site monitoring via personal computers.
- One-Way Coin Line* - Only outgoing collect calls and local sent paid messages are permitted on this line.

The Network Controlled Inmate Lines are access lines for use with coinless and coin operated* telephones provided on the premise of city, county, state and federal prisons.

Notes: International Call Blocking is an optional feature on some lines. See State Specific Rates for options. All local calls are billed as measured or message service.

* Check State Specific Rate pages for availability.

Long Distance Dialing

COCOT subscribers are able to choose the local and/or long distance carrier of their choice in the same manner as business and residential customers. Please refer to Section 8, Equal Access, for details.

Touch-Tone Service

In addition to the basic features provided on the COCOT Lines, Touch-Tone will work and is available as a line option. Call the appropriate IPPSC for details.

Screening and Blocking Features

Screening and Blocking are features available to customers who subscribe to COCOT service. Additional monthly rates may apply. These features:

- Prevent billing collect and third number billed calls to the COCOT service in most Central Offices.
- Restrict operator-assisted calls to: collect, calling-card and third party billing.
- Block calls to 976/700/900, where available.
- In New Jersey, LID (Limited InterLATA Dialing) is a fraud prevention service designed exclusively for the New Jersey Private Payphone vendor. CPPTS LID an inward screening arrangement that identifies and blocks third number and collect calls to the line. In addition, this service blocks 1+ interLATA and collect calls.

Please check with the appropriate IPPSC for state specific information.

NOTE: See Connection and Monthly Charges in State Specific Rates, Section 7.

VIRGINIA COCOT LINES

<i>Network Controlled Lines</i>	
<i>Monthly Rates:</i>	
FCC Line Cost Charge	6.53
<i>Select Local Service Package:</i>	
Coin Line One Way Measured or Coin Line Two Way Measured	23.11 21.11
Coin Line One Way Message or Coin Line Two Way Message	23.11 21.11
Coinless One Way or Coinless Two Way	11.00 8.00
Inmate Coinless One Way or Inmate Coinless Two Way	32.00 30.00
Inmate Coin One Way Measured	24.38
Inmate Coin One Way Message	24.38
<i>Other Features:</i>	
Touch-Tone: Coin/Coinless Lines Inmate Lines	0.00 0.00
International Blocking	0.00
Inward/Outward Screening 1	0.00
Inward Call Block 2	0.00
Outward Call Block 3	0.00
700 Block 4	0.00
900 Block 4	0.00
700/900 Block 4	0.00
976 Block 4	0.00
<i>One Time Installation Charges:</i>	
Dial Tone Line Connection	75.25
Order Processing Charge	72.75
International Blocking	20.00
Time & Materials Charges (beyond MPOE) Initial Visit Each 15 Minutes	42.00 16.00
<i>Other Rates:</i>	
Directory Assistance Per call, 3 call allowance	.29

Time of day discounts may apply to local usage rates. Check your local telephone directory for more information

1 Feature included on all *Network* Controlled Lines

2 Feature included on One-way Service

3 Feature included with Coinless & Inmate Service

4 Feature included on all Inmate Lines

From: Vince Townsend <vtownsend@paytel.com>
To: Henrietta.K.Singleton@Verizon.com
Subject: (Fwd) Bell Atlantic Info Package
Send reply to: vtownsend@paytel.com
Date sent: Thu, 7 Sep 2000 14:28:11 -0400

Henrietta,

Just wondered if you had a chance to come up with the answer.
Thanks,
Vince

----- Forwarded Message Follows -----

From: Vince Townsend <vtownsend@paytel.com>
To: Henrietta.K.Singleton@Verizon.com
Subject: Bell Atlantic Info Package
Send reply to: vtownsend@paytel.com
Date sent: Fri, 1 Sep 2000 09:03:53 -0400

See attached note. Have a great weekend.

Attachments:
F:\WINWORD0\JANE\Bellinfo.doc

Attachments:
F:\WINWORD0\JANE\Bellinfo.doc

From: henrietta.k.singleton@verizon.com
To: vtownsend@paytel.com
Date sent: Thu, 7 Sep 2000 14:53:42 -0400
Subject: Re: (Fwd) Bell Atlantic Info Package

Mr. Townsend, I am so sorry for the delay. I have forwarded your questions concerning Operator Services to the Inmate Manager. She is currently in Texas, with limited opportunity to return calls & messages. She will be returning to her office in Maryland on Monday. I am sure she will be able to provide the info that we need. Again, I apologize for the delay. Henrietta

"Vince Townsend" <vtownsend@paytel.com> on 09/07/2000 02:27:58 PM

Please respond to vtownsend@paytel.com

To: Henrietta.K.Singleton@Verizon.com
cc: (bcc: HENRIETTA K. SINGLETON/EMPL/PA/Bell-Atl)

Subject: (Fwd) Bell Atlantic Info Package

Henrietta,

Just wondered if you had a chance to come up with the answer.
Thanks,
Vince

----- Forwarded Message Follows -----

From: Vince Townsend <vtownsend@paytel.com>
To: Henrietta.K.Singleton@Verizon.com
Subject: Bell Atlantic Info Package
Send reply to: vtownsend@paytel.com
Date sent: Fri, 1 Sep 2000 09:03:53 -0400

See attached note. Have a great weekend.

Attachments:

F:\WINWORD0\JANE\Bellinfo.doc

Vincent Townsend
Pay Tel Communications, Inc.
PO Box 8179
Greensboro, NC 27419
Phone:336-852-7419
Fax: 336-852-9897
e-mail: vtownsend@paytel.com

The following section of this message contains a file attachment prepared for transmission using the Internet MIME message format. If you are using Pegasus Mail, or any another MIME-compliant system, you should be able to save it or view it from within your mailer. If you cannot, please ask your system administrator for assistance.

---- File information -----

File: Bellinfo.doc
Date: 1 Sep 2000, 8:59
Size: 19968 bytes.
Type: Unknown

From: Vince Townsend <vtownsend@paytel.com>
To: henrietta.k.singleton@verizon.com
Subject: Re: (Fwd) Bell Atlantic Info Package
Send reply to: vtownsend@paytel.com
Date sent: Fri, 8 Sep 2000 09:04:35 -0400

Thanks for the prompt response.
Have a great weekend.
Vince